Richard E. Leff, Esq. (RL-2123) McGIVNEY & KLUGER, P.C. 80 Broad Street, 23rd Floor New York, New York 10004 (212) 509-3456

Attorneys for Defendants: AMERICAN EXPRESS COMPANY, AMERICAN EXPRESS BANK, LTD. and AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

-----X 21 MC 102 (AKH)

DONALD ARANA (AND WIFE, LISA

ARANA)

Plaintiff(s), NOTICE OF ADOP

NOTICE OF ADOPTION OF ANSWER

Index No.: 07-CV-05335

ELECTRONICALLY FILED

TO MASTER COMPLAINT -against-

AMERICAN EXPRESS BANK, LTD, et al.,

Defendant(s).

PLEASE TAKE NOTICE that Defendants, AMERICAN EXPRESS COMPANY, AMERICAN EXPRESS BANK, LTD and AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC., by their attorneys, McGIVNEY & KLUGER, P.C., as and for their Response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopt their Answer to Master Complaint dated July 31, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendants, AMERICAN EXPRESS COMPANY, AMERICAN EXPRESS BANK, LTD and AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC., demand judgment dismissing the above-captioned action as against them,

together with their costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York August 29, 2007

Yours etc.,

McGIVNEY & KLUGER, P.C. Attorneys for Defendants AMERICAN EXPRESS COMPANY, AMERICAN EXPRESS BANK, LTD and AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC.

Richard E. Leff (RL-2123) 80 Broad Street, 23rd Floor New York, New York 10004 (212)/509-3456

TO: WORBY GRONER & NAPOLI BERN, LLP Plaintiffs Liaison
In Re Lower Manhattan Disaster Site Litigation
115 Broadway, 12th Floor
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All Defense Counsel